

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Global Brokerage, Inc. f/k/a FXCM, Inc.  
Securities Litigation

Master File No. 1:17-cv-00916-RA

This Document Relates To: All Actions

**DECLARATION OF ISRAEL DAHAN IN SUPPORT OF DEFENDANTS' MOTION  
TO EXCLUDE THE REPORTS, TESTIMONY, AND OPINIONS OF JOHN E. BARRON**

ISRAEL DAHAN, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm of King & Spalding LLP, attorneys for defendants Global Brokerage, Inc, (f/k/a FXCM Inc.), Dror Niv, and William Ahdout (collectively “Defendants”) in the above-captioned action, and a member in good standing of the bar of this Court. I respectfully submit this Declaration in Support of Defendants’ Motion to Exclude the reports, testimony, and opinions of John E. Barron.
2. Attached as Exhibit 1 is a copy of John E. Barron’s Expert Report, submitted to Defendants on behalf of Plaintiffs on April 21, 2021.
3. Attached as Exhibit 2 is a copy of Thomas Linsmeier’s Expert Report, submitted to Plaintiffs on behalf of Defendants on June 10, 2021.
4. Attached as Exhibit 3 is a copy of John E. Barron’s Rebuttal Expert Report, submitted to Defendants on behalf of Plaintiffs on July 12, 2021.
5. Attached as Exhibit 4 is an excerpted copy of the deposition transcript for the deposition of John E. Barron, taken by Defendants on June 7, 2021.
6. Attached as Exhibit 5 is a copy of the Services Agreement, effective as of March 1, 2010, produced at Bates numbers GLBR\_00110664 – 71.

7. Attached as Exhibit 6 is a copy of the Services Agreement, dated and effective as of May 1, 2010, produced at Bates numbers E Capital 000052 – E Capital 000059.

8. Attached as Exhibit 7 is an excerpted copy of the deposition transcript for the deposition of John Dittami, taken by the Commodity Futures Trading Commission on April 8, 2016.

9. Attached as Exhibit 8 is a copy of the affidavit of John Dittami, sworn to on June 1, 2017, submitted in an action against the National Futures Association (“NFA”), and used as Exhibit 15 in the deposition of John E. Barron.

10. Attached as Exhibit 9 is an excerpted copy of the deposition transcript for the deposition of John Dittami, taken by Plaintiffs on January 21, 2021, and used as Exhibit 14 in the deposition of John E. Barron.

11. Attached as Exhibit 10 is an excerpted copy of the deposition transcript for the deposition of Dror (Drew) Niv, taken by the Commodity Futures Trading Commission on May 25, 2016.

12. Attached as Exhibit 11 is a copy of the affidavit of John Dittami, sworn to on August 21, 2017, submitted in an action against the NFA, and used as Exhibit 16 in the deposition of John E. Barron.

13. Attached as Exhibit 12 is an excerpted copy of the transcript for the deposition of Dror (Drew) Niv, taken by Plaintiffs on February 11, 2021.

Dated: New York, New York  
September 9, 2021

/s/ Israel Dahan  
Israel Dahan